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KINDRED HOSPITALS EAST, LLC d/b/a
KINDRED HOSPITAL – PHILADELPHIA
and d/b/a KINDRED HOSPITAL -
HAVERTOWN

Plaintiff,

vs.

KEYSTONE FAMILY HEALTH PLAN,

Defendant.

**COURT OF COMMON PLEAS OF
PHILADELPHIA COUNTY**
No. 250200219

NOTICE OF REMOVAL TO FEDERAL COURT
BY DEFENDANT KEYSTONE FAMILY HEALTH PLAN

**TO: OFFICE OF JUDICIAL RECORDS
COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY**

In accordance with 28 U.S.C. § 1446(d), please take notice that Defendant Keystone Family Health Plan filed a Notice of Removal, attached hereto as **Exhibit “A,”** removing this action from this Court to the United States District Court for the Eastern District of Pennsylvania. *See* 28 U.S.C. § 1446(d) (“Promptly after the filing of such notice of removal of a civil action the defendant or defendants shall give written notice thereof to all adverse parties and shall file a copy of the notice with the clerk of such State court, which shall effect the removal and the State court shall proceed no further unless and until the case is remanded.”). Therefore, this Court may not proceed with this matter unless and until the United States District Court for the Eastern District of Pennsylvania remands the case back to this Court.

Respectfully submitted,

/s/ *Shane P. Simon*

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Dated: March 25, 2025

CERTIFICATE OF SERVICE

The undersigned certifies that on this date, a copy of the foregoing Notice of Removal was filed electronically and that notification of this filing was provided to the following counsel of record via electronic mail:

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/s/ Shane P. Simon
Shane P. Simon

Dated: March 25, 2025